

EXHIBIT 76

1
2 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

3 -----x
4 NATIONAL COALITION ON BLACK CIVIC
PARTICIPATION, MARY WINTER, GENE
5 STEINBERG, NANCY HART, SARAH WOLFF,
KAREN SLAVEN, KATE KENNEDY, EDA
6 DANIEL, and ANDREA SPERES,

7 Plaintiffs,

8 - against -

Civil Action No.
10-cv-8668

9
10 JACOB WOHL, JACK BURKMAN, J.M.
BURKMAN & ASSOCIATES, LL, PROJECT
11 1599, and JOHN and JANE DOES 1-10,
12 Defendants.
-----x

13
14 Remote deposition
15 May 11, 2022
16 10:08 a.m.
17
18
19

20 VIDEO-RECORDED VIDEOCONFERENCE DEPOSITION of
21 JACOB WOHL, before Michele Moskowitz, a shorthand
22 reporter and Notary Public of the State of New
23 York.
24
25

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ALSO PRESENT:

MIRIAM LI, LEGAL ANALYST

RYAN GALLAGHER, VIDEOGRAPHER

1 WOHL

2 Q. And you had no knowledge that the CDC
3 was planning to do anything like this, correct?

4 MR. KLEINMAN: Objection.

5 A. Fifth Amendment.

6 Q. Since the introduction of COVID
7 vaccines in 2021, the CDC has never used mail-in
8 voting records to track people for mandatory
9 vaccines, correct?

10 MR. KLEINMAN: Objection.

11 A. Fifth Amendment.

12 Q. At the time you sent the robocall,
13 you had no information supporting the claim that
14 the act of voting by mail would put a person's
15 information in a public database, correct?

16 MR. KLEINMAN: Objection.

17 A. Fifth Amendment.

18 Q. In fact, at the time you knew that
19 claim to be false, correct?

20 MR. KLEINMAN: Objection.

21 A. Fifth Amendment.

22 Q. At the time you sent the robocall,
23 you had no information supporting the claim that
24 police used vote-my-mail data to track down old
25 warrants, correct?

1 WOHL

2 A. Fifth Amendment.

3 Q. Trade craft is doing politics on the
4 sly, correct?

5 MR. KLEINMAN: Objection.

6 A. Fifth Amendment.

7 Q. Trade craft is -- okay. Strike that.

8 Now, the document says that, "As the
9 Russian Internet Research Agency proved in 2016,
10 building up left-wing Internet properties that
11 aim to ultimately suppress turnout is an
12 effective strategy." Did I read that accurately?

13 MR. KLEINMAN: Objection.

14 A. Fifth Amendment.

15 Q. And you wrote that because you were
16 setting the reader up to understand what it is
17 the Russians did to suppress voter turnout in
18 2016, correct?

19 MR. KLEINMAN: Objection.

20 A. Fifth Amendment.

21 Q. And it was your plan with the ACPI to
22 emulate and employ the same methods used by the
23 Russian Internet Agency in 2016 to suppress voter
24 turnout, correct?

25 MR. KLEINMAN: Objection.

1 WOHL

2 A. Fifth Amendment.

3 MR. SAWYER: Okay. Will you scroll
4 down a little bit Miriam, please? Okay.
5 Let's go to the next page. I'm sorry, I
6 want to actually -- I want to see the last
7 line of the previous page and then the first
8 two lines of this. There we go. Okay. I
9 want to see the last line of 4341 and the
10 first two lines of 4342 please. Okay.
11 Thank you.

12 Q. It says that ACPI plans to use the
13 strategy, the strategy described above used by
14 the Russian Internet Agency in 2016, to affect
15 the outcomes of Democrat party primary elections
16 which will ultimately serve to generate profits
17 for our backers on the political betting markets.
18 Did I read that accurate?

19 MR. KLEINMAN: Objection.

20 A. Fifth Amendment.

21 Q. So it was -- you were proposing in
22 this document to use Russian-style misinformation
23 to influence political betting markets, correct?

24 MR. KLEINMAN: Objection.

25 A. Fifth Amendment.

C E R T I F I C A T I O N

STATE OF NEW YORK)

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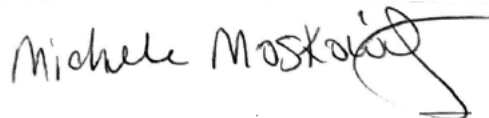
COUNTY OF NEW YORK)

I, MICHELE MOSKOWITZ, a Shorthand Reporter
and Notary Public within and for the State of New
York, do hereby certify:

That JACOB WOHL, the witness whose
examination is hereinbefore set forth, was duly
sworn/affirmed by me and that this transcript of
such examination is a true record of the
testimony given by such witness.

I further certify that I am not related to
any of the parties to this action by blood or
marriage and that I am in no way interested in
the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my
hand this 16th day of May, 2022.



MICHELE MOSKOWITZ